

**Fw: Questions for CSC about Cement Creek Document:**

**Maple Barnard** to: Sabrina Forrest, barry.hayhurst

01/18/2012 12:42 PM

From: Maple Barnard/R8/USEPA/US

To:

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----- Forwarded by Maple Barnard/R8/USEPA/US on 01/18/2012 12:40 PM -----

From: Katharine Lima <kncj@sbcglobal.net>

To: Maple Barnard/R8/USEPA/US@EPA

Date: 01/18/2012 10:55 AM

Subject: Re: Fw: Questions for CSC about Cement Creek Document:

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Annette:

Because this site has been pulled from the update and because our first priority, per EPA HQ, is the Update 56 sites, it may take a little time to get thorough answers to all the questions. But a few that I can give you right quick are as follows:

1. We generally don't recommend adjusting J-qualified source data, unless the source is contaminated soil used to identify an area of observed contamination for the soil exposure pathway (in which the source data are treated like observed release results and compared to background). The qualified data fact sheet states that it does not address using qualified data for identifying hazardous substances in a source.

Sometimes Regions do adjust qualified source data as a conservative measure, especially if comparing to a background, though. I wouldn't recommend it in this case.

5. No, I wouldn't include the COCs for the samples not used in scoring.

I'll get back to you on the remainder as soon as I can.

Thanks.

-Katharine

Katharine Lima  
Environmental Scientist  
CSC

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Springfield, Illinois 62703

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--- On **Wed, 1/18/12, Maple Barnard** <*Barnard.Maple@epamail.epa.gov*> wrote:

From: Maple Barnard <Barnard.Maple@epamail.epa.gov>

Subject: Fw: Questions for CSC about Cement Creek Document:

To: "katharine lima" <kncj@sbcglobal.net>

Date: Wednesday, January 18, 2012, 7:35 AM

----- Forwarded by Maple Barnard/R8/USEPA/US on 01/18/2012 06:34 AM

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From: "Hayhurst, Barry" <[barry.hayhurst@urs.com](mailto:barry.hayhurst@urs.com)>  
To: Maple Barnard/R8/USEPA/US@EPA  
Date: 01/17/2012 04:31 PM  
Subject: Questions for CSC about Cement Creek Document:

Annette, could you please forward these questions to CSC

Here are some small questions for CSC about the Cement Creek Document:

1. I noticed that the source sample analytical data in the Sandoval Zinc Co. source tables has been corrected for qualifiers as per the "Using Qualified Data Guidance". I thought that only background and target results were to be adjusted. Should the source data for Cement Creek be adjusted by the Using Qualified Data correction factors?
2. The elevated concentrations for the targets are taken from the dissolved aqueous data. Should the mine adit sources be dissolved also. Both dissolved and total is available. I have used dissolved.
4. Because mine waste rock sources from Grand Mogul, Mogul, Red & Bonita, and Gold King 7 Level are being combined do I include a discussion before or after the Summary of Source Descriptions Table --is this the appropriate place to discuss the common drainage, common mineralogy, common targets impacted, common weathering, etc. to justify aggregation? I have it after the summary table.
5. Should I include Chains of Custody (COCs) for samples from the 2010 SI that are not used in the scoring (i.e. sediment PCB samples).
6. Are these Figure designs what you had in mind? Do we need to change anything?

-----Original Message-----

From: Maple Barnard [mailto:[Barnard.Maple@epamail.epa.gov](mailto:Barnard.Maple@epamail.epa.gov)]  
Sent: Thursday, January 05, 2012 10:38 AM  
To: Hayhurst, Barry

Subject: Fw: Upper Cement Creek, Feedback on Working Revision  
Documentation Record

Barry

Sorry for forwarding to the wrong person. Let me know what you think  
annette

----- Forwarded by Maple Barnard/R8/USEPA/US on 01/05/2012 10:36 AM  
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From: "Schmelzer, Henry" <[henry.schmelzer@urs.com](mailto:henry.schmelzer@urs.com)>  
To: Maple Barnard/R8/USEPA/US@EPA  
Date: 01/05/2012 10:36 AM  
Subject: RE: Upper Cement Creek, Feedback on Working Revision  
Documentation Record

Annette:

I forwarded your e-mail on Upper Cement Creek onto Barry Hayhurst since  
I never have worked on the project. No problem.

Henry Schmelzer

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From: Maple Barnard [[Barnard.Maple@epamail.epa.gov](mailto:Barnard.Maple@epamail.epa.gov)]  
Sent: Thursday, January 05, 2012 9:52 AM  
To: Schmelzer, Henry  
Subject: Fw: Upper Cement Creek, Feedback on Working Revision  
Documentation Record

Henry

Please see Katharine's comments

Thank You

----- Forwarded by Maple Barnard/R8/USEPA/US on 01/05/2012 07:52 AM  
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From: Katharine Lima <[kncj@sbcglobal.net](mailto:kncj@sbcglobal.net)>  
To: Sabrina Forrest/R8/USEPA/US@EPA, Maple  
Barnard/R8/USEPA/US@EPA  
Cc: Robert Myers/DC/USEPA/US@EPA, Leslie Meador  
<[lmeador@mindspring.com](mailto:lmeador@mindspring.com)>  
Date: 01/03/2012 04:47 PM  
Subject: Upper Cement Creek, Feedback on Working Revision

## Documentation Record

Good afternoon:

Immediately before our last conference call, the Region provided a "working revision" of the HRS documentation record for Upper Cement Creek, which included three revised source descriptions. CSC has conducted an informal review of this document - overall, the presentation of the material appears to be in good shape. Please note that this was not an intensive QA review, and did not include a check of all the reference citations. CSC has some suggestions, as follows.

- Background: A line was included in the "Hazardous Substances Associated with the Source" section of each source description that appeared to inquire whether a background level should be included for comparison with the source samples. For the waste piles and the adit discharges, no background is required. CSC notes that "reference" levels have previously been provided in some cases where samples of waste were used to associate hazardous substances with the source. For example, the HRS documentation record for a Region 8 mining site that was finalized on the NPL several updates ago (Flat Creek IMM) presented published "typical" levels for metals immediately after the mining waste pile samples. CSC does not necessarily see it as advantageous to use that publication (a USGS professional paper) because some of the published metals levels (in the USGS paper) for surface soils in the area of the Upper Cement Creek site appear to be fairly broad ranges and do not compare favorably with the metals levels in the source waste pile samples.

- Containment: Generally, the written description/justification for the containment value is placed directly into the box with "Release via overland migration and/or flood." This would apply to all sources. For Source 3, it appears that the assigned value may more appropriately be

10. If the adit discharge is perennial, this, along with the sample documenting presence of hazardous substances, represents evidence of migration from the source into surface water.

- Hazardous Waste Quantity: For Sources 1 and 2, the areas provided as part of the Tier C, Volume tables are not the same as the areas provided in the Tier D, Area tables. In addition, CSC was unable to reproduce the volume calculations for these two sources as an anticipated revision to the cited reference has not yet been provided.

Please feel free to contact me if you have any questions concerning this transmittal. Thank you.

-Katharine

Katharine Lima  
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(See attached file: Fig2\_SourceSampLocs.pdf)(See attached file: Figure415mileTDTopo\_.pdf)